

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

EXECUTIVE CAR WASH OF MAPLE GLEN : NO. 02-CV-3747
:
v. :
:
ENVIRONMENTAL INC. :
:
and :
:
ENVIRONMENTAL HAZARD SERVICES, INC. :

**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANTS,
ENVIRONMENTAL, INC.'S AND ENVIRONMENTAL HAZARD SERVICES, INC.'S
SUPPLEMENTAL INTERROGATORIES ADDRESSED TO PLAINTIFF**

Plaintiff, Executive Car Wash of Maple Glen, by and through its counsel, Kaplin Stewart Meloff Reiter & Stein, P.C., hereby files its Supplemental Response to Defendants, Environmental, Inc. and Environmental Hazard Services, Inc.'s (the "Defendants") Supplemental Interrogatories Addressed to Plaintiff, Executive Car Wash of Maple Glen, as follows:

I. GENERAL OBJECTIONS

a. Plaintiff incorporates by reference the General Objections contained in its initial response to Defendants' Supplemental Interrogatories.

II. OBJECTIONS TO DEFINITIONS AND INSTRUCTIONS

Plaintiff incorporates by reference the Objections to Definitions and Instructions contained in its initial response to Defendants' Supplemental Interrogatories.

III. OBJECTIONS AND SUPPLEMENTAL ANSWERS

11. Itemize all damages sought by Plaintiff in the Complaint, and the dollar amount which may be associated with that damage.

Dr. Charles E. Pappas has testified at length in his deposition, said transcript which is incorporated by reference, concerning the damages suffered in the year 2000 when the

underground tanks and contamination were discovered. If the underground tanks and/or contamination were discovered in 1992, Dr. Pappas could have removed those storage tanks and any related contamination immediately, with an interruption in operation of the service station of only a few days, as opposed to the months of inoperation with lost rental suffered in the year 2000, occasioned by the interactions and demands of the ultimate buyer of the property. In addition, the tanks and any subsequent contamination would have been more easily and less expensively removed in 1992 than in 2000.

KAPLIN STEWART MELOFF REITER & STEIN, P.C.

By: _____
Steven Kapustin, Esquire
Attorney for Plaintiff, Executive Car Wash of
Maple Glen

Dated: May ____, 2004